



Justin B. Kaplan  
T: 305.373.9436  
justin.kaplan@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

301 South College Center, 23rd Floor  
301 South College Street  
Charlotte, NC 28202-6041  
T: 704.417.3000 F: 704.377.4814  
nelsonmullins.com

February 7, 2025

**VIA CM/ECF ELECTRONIC FILING**

The Hon. Michael A. Hammer, U.S.M.J.  
United States District Court for the District of New Jersey  
MLK Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

***RE: Khaled Elsis v. CFT Solutions LLC et al.***  
**Case No. 2:23:cv-20773**

Dear Judge Hammer:

We represent Defendants, CFT Solutions, LLC, Renan De Rocha Gomes Bastos, and Arthur Percy (collectively, “Defendants”). On January 8, 2025, the Court set a hearing to address Plaintiffs’ counsel’s motions to withdraw and Plaintiffs’ intentions to proceed pro se. (ECF No. 75-79). Your Honor expressly required in-person attendance. On January 27, 2025, Plaintiffs circulated a request for permission to appear remotely, but they did not actually file it. We include a copy of same herewith as officers of the Court.

As grounds, Plaintiffs claim—one month in advance and absent any evidence—that weather conditions *may* disrupt travel and that *potential* health risks and financial hardship. Your Honor should decline Plaintiffs’ request. This is a complex matter involving allegations of RICO violations, as well as challenges to personal jurisdiction and subject matter jurisdiction that becomes more complex as Plaintiffs’ representation and interests fracture. To wit, five of the Plaintiffs apparently retained new counsel, but he has yet to file an appearance on their behalfs. An in-person hearing is necessary to effectively resolve the pending issues related to Plaintiffs’ representation and their ability to prosecute this action collectively going forward. Counsel for co-defendant Mr. Israel indicated his preference to proceed virtually.

Respectfully,

/s/ Justin B. Kaplan

Cc: All counsel (with enclosure)

January 27, 2025

The Honorable Michael A. Hammer  
United States Magistrate Judge  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

Re: Elsisi et al. v. CFT Solutions, LLC et al. 2:23-cv-20773-MEF-MAH

Dear Judge Hammer:

We, all the undersigned plaintiffs in the above-captioned matter, respectfully request that the hearing scheduled for February 25, 2025, be conducted via Zoom. This request is made in light of the anticipated severe weather conditions in New Jersey during that period, which could present significant travel disruptions and potential health risks, particularly for plaintiffs with pre-existing medical conditions.

Furthermore, the financial burden associated with traveling long distances from Florida, Nevada, and Australia imposes an undue hardship on some of the plaintiffs, given the substantial costs of airfare, lodging, and other related expenses. Conducting the hearing remotely would not only alleviate these challenges but also ensure full participation without compromising our well-being and financial stability. The Plaintiffs firmly believe that a virtual hearing would uphold the principles of fairness and accessibility while maintaining the efficiency and integrity of the judicial process.

Part of the Plaintiffs would like to bring to the Court's attention that — Roman, Springfield, Masters, Szabo, and Lewis—have taken proactive steps to ensure compliance with the Court's procedural requirements by retaining Charles Beard, Esq., a distinguished Florida attorney with extensive experience in securities fraud.

Mr. Beard's engagement is instrumental in assisting us with critical aspects of the case, including reviewing our filings to ensure accuracy and compliance, providing strategic legal guidance, clarifying complex court orders, and ensuring we adhere to all deadlines and procedural requirements. His expertise not only enhances our ability to navigate this litigation effectively but also addresses the Court's prior concerns regarding representation and procedural compliance.

While we remain committed to pursuing our claims diligently, financial constraints have unfortunately prevented us from securing full legal representation. Despite these challenges, Mr. Beard's guidance serves as a crucial resource to help us proceed effectively within the legal framework. At present, the remaining plaintiffs from New Jersey continue to proceed pro se, as they have not yet secured consulting assistance or any form of legal representation.

In addition, Roman, Springfield, Szabo, Masters, and Lewis have recently taken a significant step by sending a Letter of Intent to Sue and a Proposed Complaint to our former attorney, Elena Fast. This upcoming hearing directly pertains to Mrs. Fast's withdrawal, and we are submitting the following documents in support of our position: (1) a copy of the Letter of Intent to Sue sent to Ms. Fast, (2) the resume of attorney Charles Beard, demonstrating his extensive qualifications and relevant experience in securities fraud, and (3) our formal agreement with Mr. Beard, outlining his specific role in our case.

To ensure the Court is well-informed, we are attaching the Letter of Intent to Sue, which was sent to The Fast Law Firm on January 24, 2025. This letter underscores our collective determination to seek legal recourse against the firm, limited to the five plaintiffs listed herein, while clarifying that the remaining nine plaintiffs from New Jersey are not part of this action. The letter is further supported by a proposed complaint, which we are prepared to file should The Fast Law Firm decline to engage in pre-trial settlement discussions. Furthermore, in the interest of fairness and procedural diligence, we formally

request that The Fast Law Firm provide their liability insurance details, allowing us to notify their insurer of our intent to sue and submit the proposed complaint. We remain committed to pursuing this matter with the utmost integrity and diligence, and we appreciate the Court's attention to these critical developments in our case.

The attached documents demonstrate our diligent efforts to address the ongoing issues in a responsible and cooperative manner, with the ultimate goal of ensuring the case progresses effectively and without unnecessary delays. We respectfully request the Court to take these significant developments into account and grant the withdrawal of The Fast Law Firm to prevent further conflict, inefficiency, and potential prejudice to the plaintiffs.

Additionally, we seek the Court's approval for remote attendance at the upcoming hearing scheduled for February 25, 2025, via Zoom. Allowing virtual participation will not only facilitate the involvement of all parties—especially those facing logistical and financial challenges—but also uphold the principles of judicial efficiency and accessibility. We are confident that granting this request will contribute to a fair and expedient resolution of the matter.

We sincerely appreciate the Court's time and consideration, and we remain available to provide any further information or clarification as needed.

Enclosures:

- Letter of Intent to Sue (Elena Fast)
- Charles Beard's Resume
- Agreement with Charles Beard

Dated: January 27, 2025

Respectfully submitted,


Gabriela Janeta Roman – Pro Se  
Address: 10020 NW 50<sup>th</sup> Manor  
Coral Springs, FL 33076  
Phone: (954)682-1985  
Email: [roma1531@gmail.com](mailto:roma1531@gmail.com)

 1/25/2025

---

Plaintiff's Signature/Signed on

Christopher Emanuel Szabo – Pro Se  
Address: 10020 NW 50<sup>th</sup> Manor  
Coral Springs, FL 33076  
Phone: (954)682-2988  
Email: [christopheremanuelszabo@gmail.com](mailto:christopheremanuelszabo@gmail.com)

 1/25/2025

---

Plaintiff's Signature/Signed on

Khaled Elsisí – Pro Se  
Address: 735 Galloping Hill Rd  
Union, NJ 07083  
Phone: (201)365-8524  
Email: [khaled\\_elsisi19@hotmail.com](mailto:khaled_elsisi19@hotmail.com)

 01/25/2025

---

Plaintiff's Signature/Signed on

Linwood Walker – Pro Se  
Address: 63 Elm Street  
Florham Park, NJ 07933  
Phone: (973)525-7790  
Email: [Lwalker3402@yahoo.com](mailto:Lwalker3402@yahoo.com)

 01/25/2025

---

Plaintiff's Signature/Signed on

Najy Kanan – Pro Se  
Address: 5 McCabe Ct  
Little Ferry, NJ 07643  
Phone: (201)600-2770  
Email: [Najy123@gmail.com](mailto:Najy123@gmail.com)

*Najy Kanan* 01/25/2025  
Plaintiff's Signature/Signed on

Robert Yeng – Pro Se  
Address: 46 Marina Drive  
Bayonne, NJ 07002  
Phone: (201)238-0074  
Email: [ryeng2012@gmail.com](mailto:ryeng2012@gmail.com)

*Robert Yeng* 01/25/2025  
Plaintiff's Signature/Signed on

Luis Pinos – Pro Se  
Address: 199 Alton St  
Elizabeth, NJ 07202  
Phone: (201)838-5897  
Email: [luispinos64@yahoo.com](mailto:luispinos64@yahoo.com)

*Luis Pinos* 01/25/2025  
Plaintiff's Signature/Signed on

Ahmed Sharafeldin – Pro Se  
Address: 482 Avenue E  
Bayonne, NJ 07002  
Phone: (201)253-9960  
Email: [ahmed.m.sharafeldin@gmail.com](mailto:ahmed.m.sharafeldin@gmail.com)

*Ahmed Sharafeldin* 01/25/2025  
Plaintiff's Signature/Signed on

Ricardo Marquez – Pro Se

Address: 122 Watson Ave

Newark, NJ 07112

Phone: (732)322-6866

Email: [MARQUEZSALES16@gmail.com](mailto:MARQUEZSALES16@gmail.com)

*Ricardo Marquez* 01/25/2025

Plaintiff's Signature/Signed on

Barry Rosner – Pro Se

Address: 50 Morris Ave, Fl 1

Summit, NJ 07901

Phone: (973)960-6520

Email: [barry.rosner@route22toyota.com](mailto:barry.rosner@route22toyota.com)

*Barry Rosner* 01/25/2025

Plaintiff's Signature/Signed on

Ahmed Khedr – Pro Se

Address: 358 Kettle Creek Rd, #4

Toms River, NJ 08753

Phone: (732)664-5502

Email: [ahmedkhedr5161@gmail.com](mailto:ahmedkhedr5161@gmail.com)

*Ahmed Khedr* 01/25/2025

Plaintiff's Signature/Signed on

Asher Bomani Lewis – Pro Se

Address: 3668 El Toro Street

Las Vegas, NV 89121

Phone: (909)635-7445

Email: [inevitablegains@gmail.com](mailto:inevitablegains@gmail.com)


*Asher Bomani Lewis* 01/26/2025

Plaintiff's Signature/Signed on

Stuart Wayne Springfield – Pro Se  
Address: 14/3 Ferguson Street  
Maylands 6051 Western Australia  
Phone: 61-438-241-970  
Email: [stuartspringfield@gmail.com](mailto:stuartspringfield@gmail.com)

 1/26/2025  
\_\_\_\_\_  
Plaintiff's Signature/Signed on


Christine Linda Masters – Pro Se  
Address: 14/3 Ferguson Street  
Maylands 6051 Western Australia  
Phone: 61-416-802-023  
Email: [chrissy.masters@icloud.com](mailto:chrissy.masters@icloud.com)

 1/26/2025  
\_\_\_\_\_  
Plaintiff's Signature/Signed on

### **CERTIFICATE OF SERVICE**

We hereby certify that on January 27, 2025, a copy of the foregoing document was served on all counsel of record via email, including The Fast Law firm.

Gabriela Janeta Roman – Pro Se  
Address: 10020 NW 50<sup>th</sup> Manor  
Coral Springs, FL 33076  
Phone: (954)682-1985  
Email: [roma1531@gmail.com](mailto:roma1531@gmail.com)

 1/25/2025  
\_\_\_\_\_  
Plaintiff's Signature/Signed on



Christopher Emanuel Szabo – Pro Se

Address: 10020 NW 50<sup>th</sup> Manor

Coral Springs, FL 33076

Phone: (954)682-2988

Email: [christopheremanuelszabo@gmail.com](mailto:christopheremanuelszabo@gmail.com)



1/25/2025

Plaintiff's Signature/Signed on

Khaled Elsisi – Pro Se

Address: 735 Galloping Hill Rd

Union, NJ 07083

Phone: (201)365-8524

Email: [khaled\\_elsisi19@hotmail.com](mailto:khaled_elsisi19@hotmail.com)



01/25/2025

Plaintiff's Signature/Signed on

Linwood Walker – Pro Se

Address: 63 Elm Street

Florham Park, NJ 07933

Phone: (973)525-7790

Email: [Lwalker3402@yahoo.com](mailto:Lwalker3402@yahoo.com)



01/25/2025

Plaintiff's Signature/Signed on

Najy Kanan – Pro Se

Address: 5 McCabe Ct

Little Ferry, NJ 07643

Phone: (201)600-2770

Email: [Najy123@gmail.com](mailto:Najy123@gmail.com)



01/25/2025

Plaintiff's Signature/Signed on

Robert Yeng – Pro Se

Address: 46 Marina Drive

Bayonne, NJ 07002

Phone: (201)238-0074

Email: [ryeng2012@gmail.com](mailto:ryeng2012@gmail.com)

Robert Yeng 01/25/2025

Plaintiff's Signature/Signed on

Luis Pinos – Pro Se

Address: 199 Alton St

Elizabeth, NJ 07202

Phone: (201)838-5897

Email: [luispinos64@yahoo.com](mailto:luispinos64@yahoo.com)

Luis Pinos 01/25/2025

Plaintiff's Signature/Signed on

Ahmed Sharafeldin – Pro Se

Address: 482 Avenue E

Bayonne, NJ 07002

Phone: (201)253-9960

Email: [ahmed.m.sharafeldin@gmail.com](mailto:ahmed.m.sharafeldin@gmail.com)

Ahmed Sarafeldin 01/25/2025

Plaintiff's Signature/Signed on

Ricardo Marquez – Pro Se

Address: 122 Watson Ave

Newark, NJ 07112

Phone: (732)322-6866

Email: [MARQUEZSALES16@gmail.com](mailto:MARQUEZSALES16@gmail.com)

Ricardo Marquez 01/25/2025

Plaintiff's Signature/Signed on

Barry Rosner – Pro Se

Address: 50 Morris Ave, Fl 1

Summit, NJ 07901

Phone: (973)960-6520

Email: [barry.rosner@route22toyota.com](mailto:barry.rosner@route22toyota.com)

*Barry Rosner* 01/25/2025

Plaintiff's Signature/Signed on

Ahmed Khedr – Pro Se

Address: 358 Kettle Creek Rd, #4

Toms River, NJ 08753

Phone: (732)664-5502

Email: [ahmedkhedr5161@gmail.com](mailto:ahmedkhedr5161@gmail.com)

*Ahmed Khedr* 01/25/2025

Plaintiff's Signature/Signed on

Asher Bomani Lewis – Pro Se

Address: 3668 El Toro Street

Las Vegas, NV 89121

Phone: (909)635-7445

Email: [inevitablegains@gmail.com](mailto:inevitablegains@gmail.com)

*Asher Bomani Lewis* 01/26/2025

Plaintiff's Signature/Signed on

Stuart Wayne Springfield – Pro Se

Address: 14/3 Ferguson Street

Maylands 6051 Western Australia

Phone: 61-438-241-970

Email: [stuartspringfield@gmail.com](mailto:stuartspringfield@gmail.com)

*Stuart Wayne Springfield* 1-26/2025

Plaintiff's Signature/Signed on


Christine Linda Masters – Pro Se

Address: 14/3 Ferguson Street

Maylands 6051 Western Australia

Phone: 61-416-802-023

Email: [chrissy.masters@icloud.com](mailto:chrissy.masters@icloud.com)



1/26/2025

Plaintiff's Signature/Signed on